

Draft Issues for State Acceptance and Concurrence

- Protectiveness of remedy
- ARARs and ARAR waivers
- Remedial Action Levels (RALs)
- *Fish consumption rates
- *Infant consumption of human breast milk
- *State remedy selection factors: effectiveness, long-term reliability, implementability, implementation risk, reasonableness of cost
- Technology assignments
- Cost effectiveness
- Flexibility during Remedial Design to modify technology assignments
- CDFs
- Sediment caps impact on beneficial uses of the harbor (navigation and development)
- Regulated Navigation Areas (RNAs)
- Remedial Action (RA) implementation schedule and sequencing
- Data management plan and database – need to maintain high quality database
- Downtown Reach – resolve any remaining data gaps
- Source control, recontamination and long-term performance monitoring
 - EPA review/concurrence on DEQ SC Summary Report
 - Definition of sediment recontamination
 - Watershed (Downtown Reach) impacts
 - Identification of StW recontamination focus sites
 - Reaffirming StW source control strategy
 - GW PRG compliance
 - Performance monitoring plan
 - Applicability of AWQCs to StW and industrial wastewater discharges
 - Applicability of MCLs to GW and SW
- Selection of ecological PRGs for TPH fractions (may have been resolved)
- Operable Units
- Remedy Action (construction) sequencing
- Agency resourcing of RD/RA – DEQ's role in overseeing RD/RA

Notes:

*Although issue is resolved, DEQ may provide comments on CR/PP/ROD.